

ESTTA Tracking number: **ESTTA465495**

Filing date: **04/04/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92054845
Party	Defendant Polo Club
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Submission	Stipulated/Consent Motion to Reopen
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Date	04/04/2012
Attachments	POLOCLUBREOPENMOTION.pdf (2 pages)(168098 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In Re Registration No. 3,312,709;
Issued on October 16, 2007

-----X
BHPC Associates LLC,

Petitioner,

v.

Cancellation No. 92054845

Polo Club,

Registrant

-----X

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

STIPULATED MOTION ON CONSENT TO
REOPEN PROCEEDINGS AND TO RESET ANSWER,
DISCOVERY AND TRIAL PERIODS AND TO SUSPEND PROCEEDINGS

It is hereby stipulated by the parties, through their attorneys, and subject to the approval of the Trademark Trial and Appeal Board that the answer, discovery and testimony periods be extended for ninety (90) days and proceedings be suspended pending settlement. The parties are actively engaged in negotiations for the settlement of this matter and this request is made in good faith and not made for the purposes of delay. The reason for this suspension of the proceedings is to permit the parties to continue with settlement discussions.

This request is regrettably being submitted late as the deadline to Answer was unintentionally and inadvertently missed. Petitioner's attorney has consented to the stipulation to extend and suspend.

As proposed, the new schedule shall be as follows:

Time to Answer	06/29/2012
Deadline for Discovery Conference:	07/29/2012

Discovery Opens:	07/29/2012
Initial Discovery Due:	08/29/2012
Expert Disclosures Due:	12/26/2012
Discovery Closes:	01/25/2013
Plaintiff's Pretrial Disclosures:	03/11/2013
Plaintiff's 30-day Trial Period Ends:	04/25/2013
Defendant's Pretrial Disclosures:	05/10/2013
Defendant's 30-day Trial Period Ends:	06/24/2013
Plaintiff's Rebuttal Disclosures:	07/09/2013
Plaintiff's 15-day Rebuttal Period Ends:	08/08/2013

Respectfully submitted,

/amanda b. agati/
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Stipulated Motion on Consent to Reopen Proceedings and to Reset Answer, Discovery and Trial Periods and to Suspend Proceedings was served on counsel for Petitioner at the following address of record, by first class mail, postage prepaid, this 4th day of April 2012:

Robert L. Epstein, Esq.
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60 East 42nd Street, Suite 2410
New York, NY 10165

Margaret Ajitsingh
Margaret Ajitsingh